

POSITION DESCRIPTION (Please Read Instructions on the Back)

1. Agency Position No.

63317

2. Reason for Submission

☒ Redescription
☐ Reestablishment

☐ New
☐ Other

Explanation (Show any positions replaced)

3. Service

☐ Hdqtrs ☒ Field

4. Employing Office Location

ATLANTA, GA

5. Duty Station

ATLANTA, GA

6. OPM Certification No.

7. Fair Labor Standards Act

☒ Exempt ☐ Nonexempt

8. Financial Statements Required

☐ Executive Personnel Financial Disclosure ☐ Employment and Financial Interest

9. Subject to IA Action

☐ Yes ☒ No

10. Position Status

☒ Competitive
☐ Excepted (Specify in Remarks)
☐ SES (Gen.) ☐ SES (CR)

11. Position Is

☐ Supervisory
☐ Managerial
☒ Neither

12. Sensitivity

☒ 1-Non-Sensitive ☐ 3-Critical
☐ 2-Noncritical Sensitive ☐ 4-Special Sensitive

13. Competitive Level Code

001

14. Agency Use

15. Classified/Graded by

Official Title of Position

Pay Plan

Occupational Code

Grade

Initials

Date

a. Office of Personnel Management

b. Department, Agency or Establishment

Financial Specialist

GS

SOI

14

OK

10/21/09

c. Second Level Review

d. First Level Review

e. Recommended by Supervisor or Initiating Office

16. Organizational Title of Position (if different from official title)

17. Name of Employee (if vacant, specify)

VACANT

18. Department, Agency, or Establishment

USEPA, REGION 4

a. First Subdivision

b. Second Subdivision

RESOURCE CONSERVATION & RESTORATION DIVISION

c. Third Subdivision

IMMEDIATE OFFICE

d. Fourth Subdivision

TG 000000

e. Fifth Subdivision

Signature of Employee (optional)

19. Employee Review-This is an accurate description of the major duties and responsibilities of my position.

20. Supervisory Certification. I certify that this is an accurate statement of the major duties and responsibilities of this position and its organizational relationships, and that the position is necessary to carry out Government functions for which I am responsible. This certification is made with the knowledge that

this information is to be used for statutory purposes relating to appointment and payment of public funds, and that false or misleading statements may constitute violations of such statutes or their implementing regulations.

a. Typed Name and Title of Immediate Supervisor

CAROLINE ROBINSON, CHIEF, RCRA AND OPA
ENFORCEMENT & COMPLIANCE BRANCH

Signature

Caroline Robinson

Date

7/7/09

b. Typed Name and Title of Higher-Level Supervisor or Manager (optional)

CAROLINE ROBINSON, CHIEF, RCRA AND OPA
ENFORCEMENT & COMPLIANCE BRANCH

Signature

Caroline Robinson

Date

7/7/09

21. Classification/Job Grading Certification. I certify that this position has been classified/graded as required by Title 5, U.S. Code, in conformance with standards published by the U.S. Office of Personnel Management or, if no published standards apply directly, consistently with the most applicable published standards.

Typed Name and Title of Official Taking Action

Chris Hoskins

Signature

Chris Hoskins

Date

10-21-09

22. Position Classification Standards Used in Classifying/Grading Position

OPM Prof. & Admin Work in the Accounty & Budget Group
GS0500, Dec 2000

Information for Employees. The standards, and information on their application, are available in the personnel office. The classification of the position may be reviewed and corrected by the agency or the U.S. Office of Personnel Management. Information on classification/job grading appeals, and complaints on exemption from FLSA, is available from the personnel office or the U.S. Office of Personnel Management.

23. Position Review

Initials

Date

Initials

Date

Initials

Date

Initials

Date

Initials

Date

a. Employee (optional)

b. Supervisor

c. Classifier

24. Remarks

ATTACHED

FPL-14

25. Description of Major Duties and Responsibilities (See Attached)

NSN 7540-00-634-4265

Previous Edition Usable

5008-106

Pen & ink change made to
Org. name/code due to
reorg; Effective 12-14-14

OF 8 (Rev. 1-85)
U.S. Office of Personnel Management
FPM Chapter 295

FINANCIAL ~~SPECIALIST~~
GS-501-14

I. INTRODUCTION

This position is located in the RCRA and OPA, Enforcement & Compliance Branch (ROECB) of the RCRA Division, EPA Region 4. The Division is responsible for implementing the financial assurance requirements of the Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Act (HSWA), and the Toxic Substances and Control Act (TSCA).

The functions of this position include: (1) serving as a national expert for implementation of EPA's RCRA Permitting, Compliance Monitoring, and Corrective Action Program pursuant to RCRA and TSCA; (2) providing comprehensive reviews of RCRA-regulated facilities' financial statements, cost estimates, and financial assurance mechanisms; (3) providing review, oversight, training and advice to EPA Regional offices and state agencies who have authorization for RCRA cost estimating and financial assurance; (4) independently developing in-house cost estimates of facilities closure plans, post-closure plans, and corrective actions; and (5) serving as a national expert regarding the preparation and dissemination of cost estimates, cost estimating training and cost estimating guidance to EPA Headquarters, Region 4, other EPA regions and offices, and state agencies.

II. MAJOR DUTIES & RESPONSIBILITIES

1. The incumbent will be responsible for providing comprehensive reviews of financial reports, cost estimates, and financial assurance mechanisms submitted directly to the Region 4 Regional Administrator in response to the financial assurance (FA) requirements of 40 CFR 264 Subpart F (264.101), 40 CFR 264 Subpart H, and 40 CFR 265 Subpart H. The FA reviews by the incumbent will determine the degree of regulatory compliance by the facilities with regard to completeness and timeliness of the financial documentation and mandatory cost estimates, and also will determine that the facility-submitted financial mechanisms are both suitable for the facilities' financial situations and fully meet the specifications of the regulations as to form and content. Where necessary, the incumbent will make enforcement recommendations to Region 4 management when facilities fail to comply with the regulations.

2. The incumbent will conduct periodic on-site reviews of state agencies' FA files to determine the extent of compliance with the requirements by the facilities within the respective states. The incumbent will monitor the facility files, and will analyze and make enforcement recommendations to Region 4 management in coordination with other EPA personnel and the states, as appropriate.

3. As necessary, the incumbent will develop detailed and comprehensive in-house cost estimates of RCRA-regulated facilities within Region 4 in order to determine the adequacy of the facility-prepared cost estimates. The incumbent will use any and all available computer-based tools, including CostPro, RACER, and Excel spreadsheets, and will employ a variety of cost estimating databases developed by such sources as RSMeans, ECHOS, HWRC, and the Corps of Engineers, as well as developing and maintaining databases of actual costs by EPA Region 4 contractors.
4. The incumbent will serve as the technical and regulatory consult to Headquarters, and other regions, state and local programs, permitting, compliance, and corrective action staff. The expert services will include reviewing and preparing estimates for high-profile and complex facilities, preparing and presenting cost estimating training, providing expert cost estimating testimony in enforcement cases, and participating in and/or leading national workgroups. Also, the incumbent will travel to FA conferences and seminars in order to make presentations relating to the cost estimating aspects of RCRA Financial Assurance.
5. As requested, the incumbent will assist EPA Headquarters in the development of guidance, policies and regulations regarding the cost estimating requirements of Subpart H of 40 CFR 264 and 265, as well as for corrective actions.
6. The incumbent will establish and maintain contacts with FA coordinators in EPA Headquarters, other EPA Regions and in state agencies in order to facilitate the uniform dissemination and application of FA regulations and policies.
7. The incumbent will establish and maintain contacts with EPA Headquarters and other federal agencies with regard to cost estimating practices, procedures and innovations which will improve the Agency's ability to review facility cost estimates.
8. The incumbent will coordinate with CERCLA and TSCA FA coordinators in Region 4 and in EPA Headquarters and other EPA regions in order to ensure consistency and cooperation among the various EPA programs which are required to enforce FA regulations.

FACTORS

1. KNOWLEDGE REQUIRED BY THE POSITION

This position requires the Mastery of a professional knowledge of the theory, concepts, principles, and practices of cost estimating and accounting and financial assurance, as required for financial evaluations and performance auditing, sufficient to conduct difficult assignments involving interfaces and inter-relationships between and among hazardous waste management and corrective action programs, systems, functions, policies, and various issues. Posses an in-depth knowledge of generally-accepted economic and financial analysis techniques, and must be able to apply that knowledge

when reviewing the financial reports and financial mechanisms submitted by RCRA-regulated facilities.

Possess an in-depth knowledge of the RCRA Subtitle C regulations, policies and guidance related to RCRA Financial Assurance and all available financial instruments on the financial market nationally and internationally. In-depth knowledge of principles for analyzing, interpreting, and presenting, cost estimating results for closure/post closure activities associated with clean-up activities at complex properties contaminated with various hazardous waste materials, and the use of the RACER, and CostPro software tools. Ability to independently review complex financial reports from corporate entities required to maintain appropriate financial instruments in an authorized permit; and manage multiple, varied and complex financial matters under tight timeframes, and make recommendations to Regional and Management and EPA Headquarters.

2. SUPERVISORY CONTROLS

Work under the administrative supervision of the RCRA Enforcement Branch Chief, who assigns work in terms of broad objectives to be achieved, major problems may be anticipated, and minimal consulting with Enforcement Management only on unusual financial issues or policy matters. Independently develops and provide training and mentoring to senior staff on complex cost estimating issues and to authorized state agencies. Completed work products will be presented with very minimal to no editorial requirements. Incumbent will independently plan the work to be done, and will coordinate with Branch Manager as appropriate, will resolve administrative problems as related to financial, economic and cost projections, and will carry assignments through to completion. Final work products and technical decisions and recommendations will be technically sound. The incumbent does utilize innovative thought and professional judgment in the development of plans and projects and in the implementation of same within the framework of national initiatives and Region 4 policies and practices.

3. GUIDELINES

Guidelines include: the Resource Conservation and Recovery Act (RCRA) and amendments; EPA Agency regulations, policies and guidelines; technical literature; Agency and regional planning criteria; and established practices. These guidelines will embrace a variety of administrative and technical criteria – involving financial matters and cost estimates – for which the incumbent must adopt, extend or independently develop supplementary approaches for approval. As a national expert, the incumbent will be expected to be able to develop solutions for unique and complex problems which may not be fully covered by existing guidelines. Innovation and initiative will be required when existing procedures are insufficient or nonexistent, and the incumbent may be required to initiate development of national and regional guidelines where necessary.

4. COMPLEXITY

Assignments will encompass the full range of RCRA financial assurance (FA) issues in the area of permitting, compliance monitoring, corrective action, cleanups under the UST, Brownfields and PCB programs, including financial reporting, FA mechanisms and cost estimates submitted by RCRA-regulated facilities ranging in size from small, privately-held enterprises to large, multi-national corporations whose assets are measured in the billions of dollars. The complexity also extends to environmental engineering and scientific applications as they concern legal requirements, demonstrated and emerging hazardous waste remediation technologies and human and ecological health assessments. Assignments also involve a full range of planning activities to impose corrective action requirements at the most environmentally significant RCRA facilities, as well as PCB, UST, and Brownfields properties. The issues may often become controversial due to the environmental and technical complexity and regulatory burdens being imposed, and solutions may necessitate the use completely new innovative approaches which must be effectively negotiated at the national, regional, state and local levels.

5. SCOPE AND EFFECT

The primary purpose of the position is to provide expert regulatory advice and guidance to EPA Headquarters, Region 4 and other regions, and to states and representatives of the regulated industries related to the resolution of financial assurance surrounding RCRA, PCB, UST, Brownfields, and Corrective Action issues. Often serving as consultant project coordinator or project manager, the financial officer is the financial authority who assures the engineers and technical authority that the cost estimates and financial instruments are adequate for corrective action plans and designs. The incumbent's recommendations and decisions may involve highly complex technical and financial problems with respect to remediation of contaminated media affecting human health and the environment. The incumbent's action may impact the overall RCRA permitting, enforcement, and or corrective action efforts and the Agency's ability to meet its priority commitments. The incumbent is recognized as a regulatory expert regarding the analysis and application of nationally and internationally available financial instruments and estimated costs related to closures, post-closures, and corrective actions. The incumbent's efforts will affect the work of other employees and subject matter specialists both within and outside the Agency. Consultation, advice and assistance will extend beyond regional boundaries to other EPA regions, states and to EPA Headquarters, and the incumbent must anticipate and initiate actions relating to emerging financial and cost estimating of technological issues.

6. PERSONAL CONTACTS

As a national expert, personal contact will include subject matter specialists within Region 4, EPA Headquarters, other EPA regions, other federal agencies, the various states, consultants and representatives of the regulated community and the public. Incumbent will independently meet with program engineers, Agency and corporate attorneys on deficient financial instruments (i.e., bond ratings, letters of credit, and trust

funds) while influencing or persuading representatives of an audited organization to accept critical or controversial observations, findings, and recommendations when representatives of audit subjects are reluctant to agree that costly errors were made, and that corrective action is required.

7. PURPOSE OF CONTACTS

Personal contacts with federal, state, and local government agencies, and the regulated community for the purpose of obtaining and exchanging information, discussing problems and proposing solutions, resolving differences and disputes, explaining recommendations and proposals, and providing feedback. Additional purpose of contacts with the regulated community is to justify, defend, negotiate or settle highly significant or controversial financial instruments shortfalls that may impact complex scientific or engineering issues.

8. PHYSICAL DEMANDS

The work primarily is sedentary in nature.

9. WORK ENVIRONMENT

The work will be primarily within the EPA offices, but may also require travel to EPA Headquarters, other EPA regional offices, state agencies' offices, and to the corporate offices of RCRA-regulated facilities.

Extramural Resources Management Duties Checklist

This checklist must be used with all PDs to identify the percentage of time an employee is engaged in duties related to managing contracts, grants, cooperative agreements, and interagency agreements. For positions requiring performance of these duties for 25% or more of the employee's time, in addition to this checklist, such duties must also be described in the body (major duties area) of the PD.

Employee Information			Percentage of Time Spent on Extramural Resources Management	
Name				
				This position has no extramural resources management responsibilities.
Position Number				Total extramural resources management duties occupy less than 25% of time.
Title	Financial Assurance Officer <i>Specialist</i>			Total extramural resources management duties occupy 25% to 50% of time. These duties are indicated below and described in the position description.
Series/Grade	GS-501-14		x	Total extramural resources management duties occupy more than 50% of time. These duties are indicated below and described in the position description.
	RCRA Division			
	RCRA and OPA Enforcement and Compliance Branch			
Organization				

When this checklist is used as an amendment to a position description, the following signatures are required:

Supervisor's Signature: Caroline Y. Robinson Date: 11/2/09

Personnel Specialist's Signature: _____ Date: _____

Part 1. Contracts Management Duties

			Monitors management and performance of delivery orders/work assignments after award	
Pre-award:			Defines scope of work for work assignments	
	Plans Procurements			Approves payment requests of ACH drawdowns
x	Estimates Costs			Manages cost-reimbursement contracts
	Obtains funding commitments			Reviews invoices
	Prepares procurement requests		x	Inspects and accepts deliverables
	Writes statements of work			Other (list)
x	Reviews statements of work			
	Processes unsolicited proposals			
	Responds to pre-award inquiries			
	Participates in pre-award conferences		Close-out:	
	Conducts technical evaluation of proposals			Writes reports on contractor performance, costs, and tasks performed
	Participates in debriefing/protests			
	Other (lists)		x	Reconciles payments with work performance
				Closes-out payments
				Performs cost accounting
Post-award:			Provides assistance to Contracting Officer in settling claims	
	Prepares delivery orders			
x	Reviews contractor work plans			Other (list)
x	Reviews contractor progress reports		x	
	Monitors government-furnished property		Percentage of Time Spent on Contracts Management	
	Monitors cost, management, and overall technical performance of contract after award		35	%

Continued

Part 2. Grants/Cooperative Agreements Duties		Advises Grants Management Office of potential problems/issues	
Pre-application/Application:		Participates in decisions/actions to ensure successful project completion and in decisions to impose sanctions	
Prepares solicitation for proposals		Approves payments requests or ACH drawdowns	
Identifies potential grantees for area of program emphasis		Reviews requests for modifications, additional funding, etc., and makes recommendations to Grants Management Office	
Makes initial determinations (whether project is procurement or assistance, whether agency has legal authority, whether applicant is eligible, whether funding is available, etc.)		Negotiates amendments	
Provides administrative information to applicants		Reviews Cost/Price/Analysis for recipient contracts/change orders (Superfund only)	
Determines appropriateness of applicant's workplan/activities/budget and compliance with regulations and guidelines and negotiates changes with applicant		When necessary, recommends termination of the Agreement	
Assists applicant in resolving issues in application		Resolves with Grants Management Office administrative and financial issues	
For cooperative agreement, determines substantial Federal involvement and develops a condition for agreement		Conducts periodic reviews to ensure compliance with agreement	
Negotiates level of funding		Other (list)	
Conducts site visits to evaluate program capability		Close-out:	
Serves as resource to Selection Panel		Certifies deliverables were satisfactory and timely	
Informs applicants of funding decisions		Provides assistance to recipients and Grants Management Office to ensure timely close-out	
Other (list)		Reconciles payment with work performed	
Award:		Notifies recipient of close-out requirements	
Prepares funding package, including Decision Memorandum		Obtains legal assistance if necessary to resolve incomplete close-out	
Obtains concurrences/approvals		If project is audited, responds to issues and ensures recipient complies with audit recommendations	
Reviews/concurs in completed document		Other (list)	
Establishes project file			
Other (list)			
Project Management/Administration:		Percentage of Time Spent on Grants/Cooperative Agreements Management	
Monitors recipient's activities and progress			
Reviews reports and deliverables and notifies recipient of comments			
Provides technical assistance to recipients			
Part 3. Interagency Agreements Duties			
Pre-Agreement:		Monitors cost management and overall technical Performance	
Plans and negotiates work effort		Participates in decisions about project modification/termination	
x Estimates costs	x	Conducts periodic review of Superfund State Contracts payments receipts (Superfund only)	
Obtains funding commitments		Inspects and accepts deliverables	
Prepares commitment notice		Other (list)	
Writes or reviews scope of work			
Responds to pre-agreement inquiries			
Participates in pre-agreement conferences			
Coordinates with appropriate staff in developing			
x Independent Government Cost Estimates (IGEs)		Close-out:	
Negotiates and ensures execution of Superfund State Contracts (Superfund only)		Reviews final report	
x Performs technical evaluation of work plan and budget		Decides on disbursement of equipment	
Prepares funding package and obtains necessary concurrences		Reconciles payments with work performed	
Other (list)		Reviews Superfund State Contracts to ensure full reimbursement (Superfund only)	
		Certifies deliverables	
		Resolves close-out issues with Grants Management Office/other agency	
		Other (list)	
Project Management/Administration:		Percentage of Time Spent on Interagency Agreements Management:	
Reviews progress reports/financial reports			
		35%	



United States
ENVIRONMENTAL PROTECTION AGENCY
Washington, DC 20460

SF 52 Checklist

SF 52 Request #: RR-09-057 Position Title/Series: Financial Assurance Officer
GS-501 ^{Specialist}

Entry Grade(s)/Full Performance Level of Position: 14

Functional Title (e.g., On-Scene Coordinator, PO, RPM, Accountant): _____

DIRECTIONS: This form must be completed by the hiring official or supervisor for all personnel actions involving a change in position description (exceeding 180 days) and must be submitted along with the SF 52 Request for Personnel Action.

Is this position one of the following that has been predesignated? Yes ☐ No ☒

If you answered "Yes," please skip all remaining questions, sign and date the form.

- | | |
|---|--|
| <input type="checkbox"/> On-Scene Coordinator (High Risk) | <input type="checkbox"/> Contract Specialist (Moderate Risk) |
| <input type="checkbox"/> Remedial Project Manager (Moderate Risk) | <input type="checkbox"/> Grants Specialist-GS 12 and below (Low Risk) |
| <input type="checkbox"/> RCRA Corrective Action Officer (Moderate Risk) | <input type="checkbox"/> Grants Specialist-GS 13 and above (Moderate Risk) |
| <input type="checkbox"/> Inspector (Moderate Risk) | <input type="checkbox"/> Attorney (Moderate Risk) |
| <input type="checkbox"/> Criminal Investigator (High Risk) | <input type="checkbox"/> Deputy Division Director (High Risk) |
| <input type="checkbox"/> Grants Project Officer (Moderate Risk) | <input type="checkbox"/> Supervisor of High Risk Employees (High Risk) |
| <input type="checkbox"/> Contract Project Officer (Moderate Risk) | |

Directions for Questions 1-13: Answer all "Yes/No" questions. For questions answered "Yes," check all items that apply. Where explanation is requested, attach additional pages if needed.

(1) Requires access to classified or sensitive information or materials: Yes ☒ No ☐

- | | |
|---|---|
| <input type="checkbox"/> Secret | <input type="checkbox"/> Other information that if compromised could cause harm |
| <input type="checkbox"/> Top Secret | <input checked="" type="checkbox"/> Audits |
| <input type="checkbox"/> Personally identifiable information | <input type="checkbox"/> Investigations |
| <input checked="" type="checkbox"/> Proprietary information | <input type="checkbox"/> EPA's financial resources/records |
| <input checked="" type="checkbox"/> Confidential business information | |

Hazardous or dangerous material (nuclear, biological, or chemical) Yes ☐ No ☐

What hazardous materials are involved? _____

(2) Makes final decisions or authoritative recommendations, including ones that may have a direct effect on health and safety: Yes ☐ No ☒

(3) Supervision level received:

- ☐ Close supervision
☐ General supervision
☒ Administrative only

Work is reviewed:

- ☐ While in progress
☒ Only after completion

Administrative controls are in place: Yes ☒ No ☐

What are they? SOPs regarding how Financial Assurance Cost Estimates should be conducted.

(4) Obligates the Agency to take action or to spend funds. Yes ☐ No ☒

What actions? _____

What amount of funding? _____

What is the financial limit? _____

SF 52 Request#: RB-09-057

(5) Interacts with external contacts in performing duties, and/or represents the Agency to external organizations or citizens:
Yes ☒ No ☐

Communicates with:

- ☐ Individuals
☒ Government-wide audience
☒ Audience beyond government

Communication products involved are:

- ☒ Technical or policy reports
☒ Documents containing sensitive information
☐ Outreach or public relations material
☒ Material posted on the EPA intranet or website

(6) Makes policy: Yes ☐ No ☒

(7) Protects critical infrastructure systems/programs, such as water treatment or other utilities and telecommunications:
Yes ☐ No ☒

What is involved? _____

(8) Directly enforces health regulations and/or protects public safety: Yes ☐ No ☒

(9) Investigates or audits government/other personnel, programs and activities: Yes ☒ No ☐

What personnel, programs and/or activities are involved? Financial/Audit Tools at facilities Treating/Storing & Disposing of Haz. Waste Materials

(10) IT position that creates, programs, administers, or protects government information technology systems, databases or infrastructure: Yes ☐ No ☒

(11) Requires credentials: Yes ☒ No ☐

(12) The scope of this position is:

- ☐ Local
☐ Regional
☒ National
☐ Global

The impact/potential harm this position could cause would be:

- ☐ Internal to EPA
☐ Government-wide
☒ Beyond the government

(13) Other unique or critical characteristics/duties/requirements not covered above? Yes ☐ No ☒

Explain what they are: _____

Caroline Y. F. Robinson
Name (Please Print)

Chief, RCRA and OPA Enforcement Branch
Title

Caroline Y. F. Robinson
Signature

11/2/09
Date

PSB Use Only

Risk Designation: